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Attorneys for Plaintiff  
JOHN DOE

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA**

JOHN DOE,

Plaintiff,

v.

COUNTY OF SOLANO, ARMANDO  
ESPINOZA, and STEPHANIE M. GARCIA, and  
DOES 1 through 20, inclusive,

Defendants.

Case No. 2:23-cv-00180-AC

**STIPULATION AND ~~PROPOSED~~  
ORDER TO CONTINUE DEADLINE  
TO JOIN ADDITIONAL PARTIES**

Pursuant to Local Rules 143 and 137(b), plaintiff John Doe (“Plaintiff”) and defendants County of Solano (“County”), Armando Espinoza and Stephanie Bachman (erroneously sued as Stephanie M. Garcia) (collectively, “Defendants”) (all parties, collectively, the “Parties”) stipulate as follows:

1. Plaintiff filed his complaint against Defendants on December 28, 2022 in the Superior Court of the State of California, County of Solano. Dkt. No. 1, Ex. A. The complaint included doe defendants.
2. Defendants removed the action to this Court on January 30, 2023. Dkt. No. 1.
3. The Court entered a scheduling order on June 23, 2023, which set August 31, 2023 as the deadline to join additional parties. Dkt. No. 15, p. 1:22-25.
4. On July 14, 2023, Plaintiff issued discovery to defendant County of Solano intended to assist

1 him with identifying doe defendants. Plaintiff granted defendant County of Solano an extension of  
2 time to respond to that discovery until August 28, 2023.

3 5. The Parties have also been attempting to find a resolution to privacy concerns that Defendants  
4 have raised and that they contend prevent Defendants from providing Plaintiff some of the requested  
5 information.

6 6. The deadline for joining additional parties should be extended until September 29, 2023 to  
7 permit Plaintiff time to review defendant County of Solano's discovery responses in the event they  
8 disclose the identity of individuals that the complaint currently identifies as doe defendants and to  
9 allow the Parties additional time to address privacy concerns Defendants have raised.

10 It is so stipulated.

11  
12 Dated: August 16, 2023

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13  
14 By: /s/ Pamela E. Glazner  
15 Pamela E. Glazner  
16 Attorneys for Plaintiff JOHN DOE

17 Dated: August 16, 2023

HAWKINS PARNELL & YOUNG, LLP

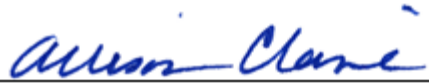
18  
19 By: /s/ Danielle K. Lewis (authorized on August 16, 2023)  
20 Danielle K. Lewis  
21 Attorneys for Defendants COUNTY OF  
22 SOLANO, ARMANDO ESPINOZA and  
23 STEPHANIE BACHMAN (erroneously sued as  
24 STEPHANIE M. GARCIA)  
25  
26  
27  
28

**[PROPOSED] ORDER**

The Court, having reviewed the foregoing Stipulation, and good cause appearing therefor, hereby orders that the deadline for joining additional parties is extended to September 29, 2023.

IT IS SO ORDERED.

DATED: August 16, 2023

  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE